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AL THANI

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

**IN RE APPLICATION OF  
PATRICK MCKILLEN AND  
HUME STREET  
MANAGEMENT  
CONSULTANTS LIMITED FOR  
AN ORDER PURSUANT TO 28  
U.S.C. § 1782,**

Applicants.

CASE NO.: 2:24-mc-00062-JFW-PD

**DECLARATION OF KHALED B.  
ABBAS IN SUPPORT OF MOTION  
TO QUASH SUBPOENAS ISSUED  
UNDER 28 U.S.C. § 1782.**

**DISCOVERY MATTER**

Magistrate Judge: Patricia Donahue  
Courtroom: 580  
Hearing Date: January 31, 2025  
Hearing Time: 1:30 p.m.

Discovery Cutoff: Not applicable  
Pre-trial Conference: Not applicable  
Trial Date: Not applicable

**DECLARATION OF KHALED B. ABBAS**

1  
2 1. I am over the age of 18 and not a party to this action. I am an attorney admitted  
3 to practice before the courts of the State of California and have been admitted to this Court.  
4 I am an attorney at the law firm of Skadden, Arps, Slate, Meagher & Flom LLP, which is  
5 counsel of record for Specially Appearing Movant Sheikh Hamad bin Jassim bin Jaber bin  
6 Mohammed bin Thani al Thani (“HBJ”) in the above-captioned matter. I submit this  
7 declaration in support of HBJ’s Motion to Quash Subpoenas Issued Under 28 U.S.C. §  
8 1782 (the “Motion”). I make this declaration based on my own personal knowledge, and if  
9 called upon to do so, could and would testify competently thereto.

10 2. I am a native Arabic speaker and am fluent in Arabic and English. I can read  
11 and write Arabic and English. In addition to being a native Arabic speaker, I received  
12 formal instruction in Arabic and English through elementary, middle and high school.

13 3. Attached hereto as **Exhibit 1** is a true and correct copy of a November 29,  
14 2022, social media post that HBJ made on the Instagram platform in Arabic, as well as the  
15 machine-translated English version that was created by Instagram’s built-in translation  
16 feature. I reviewed this social media post in Arabic and the machine-translated English  
17 version. I understand that Applicants Hume Street Management Consultants Limited and  
18 Patrick McKillen have relied upon this social media post to assert that HBJ lives in Los  
19 Angeles.

20 4. Instagram’s built-in translation feature translated the Arabic text to “Today at  
21 my home with friend Mukesh Ambani Los Angeles.”

22 5. While the English translation uses the word “home,” the Arabic word used by  
23 HBJ that it is translating—for which the English transliteration is “manzil”—does not  
24 necessarily mean “home” in the same sense it is normally used in the English language to  
25 signify one’s primary place of residence. Rather, “manzil” can be used to generally refer  
26 to a house, inn, or any place of dwelling without signifying that the location is the speaker’s  
27 primary place of residence.

1           6.     The Oxford Essential Arabic Dictionary confirms that the word “manzil” can  
2 refer to a house or place of dwelling, as opposed to “home.” Attached hereto as **Exhibit 2**  
3 is a true and correct copy of an excerpt of the Oxford Essential Arabic Dictionary, which  
4 provides that the word “manzil” is the correct Arabic translation for the English word  
5 “house.”

6           7.     Further, HBJ has used the same word “manzil” to describe many different  
7 properties around the world, which is additional support that HBJ is using the word to  
8 simply describe the location as a house where he was currently located at the time the  
9 photograph was taken, as opposed to his primary personal residence. Attached hereto as  
10 **Exhibits 3 and 4** are true and correct copies of HBJ’s public Instagram posts made in  
11 Arabic on May 2024 and October 2023, respectively, accompanied by the machine-  
12 translated English version of those same posts. I accessed these public social media posts  
13 from the Instagram platform.

14           I declare under penalty of perjury under the laws of the State of California and the  
15 United States of America that the foregoing is true and correct.  
16

17           Executed on November 14, 2024, in Los Angeles, California.  
18

19  
20           By: \_\_\_\_\_



Khaled B. Abbas

# Exhibit 1







# Exhibit 2

# **Oxford Essential Arabic Dictionary**

ENGLISH-ARABIC

ARABIC-ENGLISH

OXFORD



**OXFORD**

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**2**

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**homosexual** /həʊmə'sekʃuəl/ *adj* شاذّ جنسياً

**honest** /'ɒnɪst/ *adj* صادق

**honesty** /'ɒnəsti/ *n* صدق

**honey** /'hʌni/ *n* عسل

**honour** /'ɒnə(r)/ *n* US -nor شرف

♦ *v* (an agreement) يُنفَّذ (the dead) يُشرف

**hood** /hʊd/ *n* قلنسوة

**hook** /hʊk/ *n* خطاف

**hop** /hɒp/ *v* يثب

**hope** /həʊp/ *n* أمل/آمال مف/ج  
♦ *v* يأمل

**hopeless** /'həʊpləs/ *adj* ميئوس منه

**horizon** /hə'reɪzn/ *n* أفق/أفاق مف/ج

**horizontal** /hɒrɪ'zɒntl/ *adj* أفقي

**horn** /hɔ:n/ *n* (of a bull) قرن/قرُون  
بوق/أبواق مف/ج (in music) مف/ج  
منبّه/منبّهات مف/ج (car's)

**horrible** /'hɒrəbl/ *adj* كَرِه (picture)  
مروّع (murder, etc) فظيع (weather)

**horrify** /'hɒrɪfaɪ/ *v* يروّع

**horror** /'hɒrə(r)/ *n* رعب

**horse** /hɔ:s/ *n* حصان/حصن وأحصنة  
مف/ج

**hospitality** /hɒsprɪ'tæləti/ *n* حُسن الضيافة

**host** /həʊst/ *n* مُستضيف

**hostage** /'hɒstɪdʒ/ *n* رهينة/رهائن مف/ج

**hostile** /'hɒstail/ *adj* عدائي

**hostility** /hɒ'stɪləti/ *n* pl -ties عدا  
عداات مف/ج

**hot** /hɒt/ *adj* (soup, day, pan)

ساخن، حار

a hot drink مشروب ساخن

I'm hot. أشعر بالحر.

It's hot today. هذا اليوم حار.

**hotel** /həʊ'tel/ *n* فندق/فنادق مف/ج

**hour** /'aʊə(r)/ *n* ساعة/ساعات مف/ج

two hours later بعد ساعتين

in four hours بعد أربع ساعات

every hour كل ساعة

It will take an hour.

سوف تستغرق ساعة

**house** /haus/ *n* منزل/منازل مف/ج

**housing** /'haʊzɪŋ/ *n* إسكان

**how** /hau/ *adv* كيف

How do you do it? كيف تفعل ذلك؟

How are you? (I'm) Fine!

كيف حالك؟ أنا جيد!

How do you do! كيف حالك؟

# Exhibit 3









# Exhibit 4





